

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 16-10094-LTS
)	
ROSS MCLELLAN,)	
)	
Defendant.)	
_____)	

**GOVERNMENT’S ASSENTED-TO MOTION TO SEAL RESPONSE TO
DEFENDANT’S MOTION FOR RULE 15 DEPOSITIONS**

The government respectfully requests leave from this Court to file under seal its Response in Opposition to Defendant’s Motion for Rule 15 Depositions. The defendant’s original motion was filed under seal due to concerns about discussing documents subject to a protective order. *See* Dkt. 293, 294. The government’s response, in turn, quotes portions of draft deposition transcripts in the civil related case, *S.E.C. v. McLellan*, 1:16-cv-10874, and thus should also be filed under seal.

WHEREFORE, the government respectfully requests that the instant motion be granted.

Respectfully submitted,

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COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

The undersigned counsel conferred with counsel for the defendant, Martin G. Weinberg, who does not oppose this motion.

CERTIFICATE OF SERVICE

I certify that on March 5, 2018, this document was filed through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ William E. Johnston
WILLIAM E. JOHNSTON